UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

BRENDAN McGUINNESS,

CIVIL ACTION NO. 05-11738-EFH

Plaintiff,

v.

JAMES R. BENDER, LOIS RUSSO, MICHAEL D. FARLEY, JASON J. OLIVER, DAVID M. SHAW, JUAN MEZA, JOHN A. BELAIR, and JOHN A. FLOWERS,

Defendants.

MOTION TO FURTHER ENLARGE TIME FOR RESPONDING TO DISCOVERY

The defendants, by counsel, move that the time for responding to the plaintiff's two sets of interrogatories, each entitled "Plaintiff's Request for Admissions and/or Interrogatories of Defendants, dated August 11, 2006, be further enlarged up to and including **October 27, 2006**. As reason therefore, the defendants state that counsel requires additional time to complete and serve defendants' discovery responses. The additional time is required because of counsel's other litigation responsibilities, and because of the increasing number of cases assigned to this office.

Dated: October 13, 2006 Respectfully submitted,

> NANCY ANKERS WHITE Special Asst. Attorney General

/s/ William D. Saltzman_

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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 13, 2006.

Dated: October 13, 2006 /s/ William D. Saltzman_____

William D. Saltzman